

VIA ELECTRONIC FILING

November 28, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

**Re: VoIP E911 Compliance Report (November 28, 2005)
CoreComm Voyager, Inc.; WC Docket No. 05-196**

Dear Ms. Dortch:

CoreComm Voyager, Inc. (“Voyager”), through its undersigned counsel and pursuant to Commission Rule 9.5(f), as adopted by the Commission in its *Order*¹ concerning the enhanced 911 (“E911”) service requirements and conditions for interconnected Voice over Internet Protocol (“VoIP”) service providers, submits this Compliance Report (“Report”). In addition, Voyager respectfully requests a two week extension of time to supplement this Report to provide further information not yet available despite Voyager’s best efforts to obtain the information from Broadvox, its underlying provider.

Voyager is a regional provider of integrated traditional and “next gen” Internet and other mission-critical technologies. Voyager currently serves approximately 120,000 residential and commercial dial-up and broadband Internet customers throughout the Company’s Midwest region. Voyager is a new entrant into the interconnected VoIP provider services (“IVSP”) market. Voyager began to provide service in September 2005. Currently, Voyager provides IVPS on a resold basis to approximately 160 customers which are primarily located in selected metropolitan areas within the Midwest United States.

¹ *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking 20 FCC Rcd. 10245 (2005) (“*Order*”).

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As required by the Commission's Rules and its November 7, 2005 Public Notice (the "Public Notice"),² this Report details Voyager's efforts to provide E911 service to customers in compliance with Rules 9.5(b) and (c) and to satisfy the registered location requirements of Rule 9.5(d). In preparing this report, Voyager has relied on the information supplied to it by Broadvox, Voyager's underlying provider and by HBF, a third party provider of E911 services. In response to the information requested by the Enforcement Bureau in the Public Notice, Voyager provides the following:

1) Voyager 911 Compliance Status

As a new entrant reseller of IVSP services, Voyager relies on the E911 services provided by HBF, the third party supplier of E911 services retained by Voyager's VoIP provider Broadvox, to obtain compliance with the obligations and requirements set forth in the Commission's Order.

- a) **911 Routing Information/Connectivity to Wireline E911 Network: Statement as to whether Voyager is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."**

RESPONSE: Despite Voyager's best efforts, it has not yet been able to confirm with precision the full extent to which the 911 service being provided is in compliance with the Commission's rules. Voyager's VoIP provider has provided a rough estimate, subject to further confirmation from its E911 provider, that its services are approximately 30 percent compliant and that full compliance should be achievable by the end of the year. However, Voyager is continuing to work with its third-party provider to complete that determination and it will promptly advise the Commission upon receipt of that information.

As a reseller of VoIP services, Voyager does not have direct control over the networks and operations through which its services, and the associated E911 services are provided. As a result, Voyager must rely on Broadvox and HBF for its E911 compliance. Voyager understands that in some of the areas in which Voyager operates, HBF may not yet have established connection with the ILEC selective router and that therefore E911 call termination through the Wireline E911 Network may not yet be available. As a reseller, Voyager is not itself directly or indirectly connected to any selective routers.

² *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

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- b) **Transmission of ANI and Registered Location Information:** A statement as to whether Voyager is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information.

RESPONSE: To the extent that the E911 provider upon which Voyager relies for E911 service transmits calls via the existing Wireline 911 Network, it is Voyager's understanding that ANI and Registered Location information are also being transmitted. With respect to such delivery, however, HBF has advised Voyager that delivery of ANI and registered location information to the PSAP requires connection agreements with all the ILECs, frame relay circuits to all the ALI databases, testing of links and data exchange, and loading of ESQKs into all the ALI databases. The circuit ordering timeframe is usually 4-6 weeks. Some of the smaller ILECs still do not have their VoIP ordering processes in place so no circuits have been ordered. HBF has advised Voyager that it is installing these circuits but that the 120 day timeframe from the FCC does not allow enough time to negotiate interconnection agreements with the ILECs and then order the circuits.

In addition, Voyager understands that ESQKs have to be assigned and allocated and that the ESQK assignment issue current sits with the FCC to name an interim administrator for these non-dialable numbers. HBF has indicated that without FCC guidance, it is nearly impossible to deploy services on a nationwide basis.

Finally, HBF has advised that its solution requires testing with over 6000 PSAPs to meet the deadline. Such testing requires significant time as each PSAP must be tested with each ESQK. As a result, HBF has advised that the 120 day timeframe does not allow enough time for the negotiation of interconnection agreements with each ILEC, the provisioning of circuits, the creation of ESQK shell records, and the scheduling/execution of testing with 6000 PSAPs. HBF has advised that these effort are underway but are not complete yet.

Until these issues are resolved, Voyager will utilize an interim solution offered by HBF that uses a web-based solution that allows PSAPs to see the real-time ANI/ALI information for each VoIP call. This interim solution will greatly enhance PSAP access to callback information when the call is delivered via the i1 solution.

- c) **911 Coverage:** To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

RESPONSE: Voyager relies entirely on the third party E911 provider of its underlying carrier for compliance with the Commission's Rules. Voyager understands that HBF has been actively

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RESPONSE: Voyager relies entirely on the third party E911 provider of its underlying carrier for compliance with the Commission's Rules. Voyager understands that HBF has been actively

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involved in meeting the requirements of the Order. Despite those efforts, however, a complete solution is not yet available. Voyager is currently marketing E911 services in the states of Ohio, Michigan, Illinois, Indiana, and Wisconsin.

In order to comply with the Commission's Rules, Voyager understands that its underlying provider has contracted with a third-party provider. Voyager understands that although full compliance has not yet been achieved, HBF has been actively working with NENA, ATIS, the VON Coalition, as well as with every ILEC to complete the ESQK assignment process and finalize the ANI/ALI links. Access to the selective routers is being achieved through partnerships with CLECs throughout the country.

As an interim measure, Voyager understands that HBF's current 11 solution is able to deliver emergency calls to 100% of the PSAPs via a 10-digit number. This solution provides 100% coverage in the United States. In the meantime, in the event a call cannot be delivered directly to the PSAP the caller is routed to a national call center with trained emergency operators which is operated on an around the clock basis.

2) **Obtaining Initial Registered Location Information:** Actions Voyager has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location.

RESPONSE: Each Voyager subscriber is informed of 911 acknowledgement and registration at the time of sale and registered location information must be submitted at the time of subscription. Customers must provide the information prior to using any of the features available through the online service management portal. In the event that the Company becomes aware that a Registered Location is missing, Voyager takes the following steps:

- Emails the customer indicating that action needed, along with a required action date.
- Voice Mail is inserted into the customers voice mail box
- Customers are called by live agents stating the action to be taken.
- Should no action be taken, service will be interrupted. An interruption message will be played on any inbound and outbound traffic
- Should the customer fail to take any action, service is interrupted until the 911 customer has submitted a registered location.

Currently, Voyager believes that it has accurate registered location information for all of its customers.

3) **Obtaining Updated Registered Location Information:** Methods Voyager offers to its subscribers to update their Registered Locations.

RESPONSE: Voyager customers can update their registered locations either through Company's web-based the service management portal or via contacting a customer service representative to have that information updated for them. Voyager's customer services

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representatives can be reached through the use of the IVP devices through which ATC service is obtained.

- 4) **Technical Solution for Nomadic Subscribers:** A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

RESPONSE: Voyager, through Broadvox, has a real-time interface between its platform and HBF that allows instant address validation and PSAP assignment. This interface allows Voyager subscribers to enter a new 911 address on its site and have instant verification that the address is valid and that 911 service is activated for the new site. This also allows the subscriber to have real-time error notices that will allow them to correct their address if there is an issue with it. Voyager understands that HBF has full PSAP boundary information for the entire United States and can instantly assign a subscriber to the appropriate PSAP as soon as they enter their address. This allows for real-time support of nomadic subscribers.

Respectfully submitted,

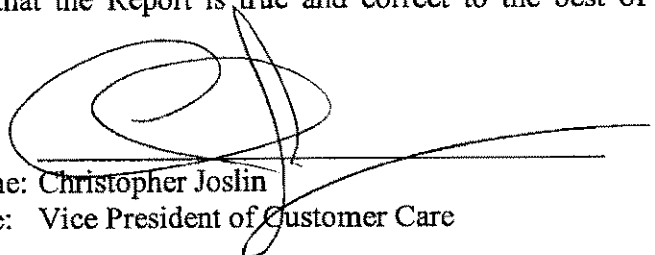


Eric J. Branfman
Danielle C. Burt

Counsel for CoreComm Voyager, Inc.

cc: Byron McCoy (FCC)
Kathy Berthot (FCC)
Janice Myles (FCC)
Best Copy and Printing, Inc.

I, Christopher Joslin, state that I am Vice President of Customer Care for CoreComm Voyager, Inc. ("Voyager"); that I am authorized to submit the forgoing VoIP E911 Compliance Report on behalf of Voyager; that the Report was prepared under my direction and supervision; and I declare under penalty of perjury that the Report is true and correct to the best of my knowledge, information, and belief.



Name: Christopher Joslin

Title: Vice President of Customer Care